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4 The Honorable Ronald B. Leighton  
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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT TACOMA

11 TINA L. HART, ) No. 08-05248 RBL  
12 )  
13 Plaintiff, ) STIPULATION RE: FILING OF  
14 v. ) AMENDED COMPLAINT  
15 )  
16 SSA MARINE, INC., a Washington )  
17 corporation; PACIFIC MARITIME )  
18 ASSOCIATION, a California corporation; and )  
19 INTERNATIONAL LONGSHORE AND )  
20 WAREHOUSE UNION, LOCAL 21, )  
21 Defendants. )  
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29 The Parties to the above-captioned matter, through their undersigned counsel of  
30 record, hereby stipulate as follows:

31 1. The above-captioned action for employment discrimination (“Action”) was  
32 filed by Plaintiff Tina L. Hart (“Hart”) in the Federal District Court for the Western District of  
33 Washington on or about April 21, 2008, naming as Defendants SSA Marine, Inc. (“SSA”),  
34 Pacific Maritime Association (“PMA”), and the International Longshore and Warehouse  
35 Union, Local 21 (“ILWU Local 21”).

36 2. The deadline to file a motion to join parties in this case pursuant to the Court’s  
37 case schedule was September 16, 2008.

3. On or about February 12, 2009, Hart filed a motion to amend her complaint, adding the ILWU International as a Defendant and asserting a third cause of action for Declaratory Judgment and/or Injunctive Relief. Hart proposes to assert against the ILWU International only this third cause of action, and does not assert any claim for monetary damages against the ILWU International. Hart's proposed First Amended Complaint is attached hereto as Exhibit "A".

4. Permitting Hart to file the First Amended Complaint will not prejudice any party. The law firm of Leonard Carder, LLP, in San Francisco, represents ILWU Local 21 in this Action. The same law firm will represent the ILWU International. Pursuant to the Court's Order of August 17, 2008, the deadline for completion of discovery in this Action is July 6, 2009. To date, the only deposition that has been taken is that of Hart, which is ongoing and will be completed at a date yet to be established.

5. Accordingly, all Parties stipulate that Plaintiff Tina Hart should be granted leave to file the First Amended Complaint attached hereto, provided that such stipulation not prejudice any Party from subsequently challenging any allegations in the Complaint or defending against any of its causes of action or claims for relief.

DATED: February 24, 2009                      LEONARD CARDER, LLP

By: /s/ Jacob F. Rukeyser  
Beth A. Ross, Cal. Bar No. 141337, *Pro Hac Vice*  
Jacob F. Rukeyser, Cal. Bar No. 233781, *Pro Hac Vice*

Robert H. Lavitt, WSBA No. 27758  
SCHWERIN CAMPBELL BARNARD  
IGLITZIN & LAVITT LLP

Attorneys for Defendants  
ILWU LOCAL 21

1 DATED: February 24, 2009

RYAN, SWANSON & CLEVELAND, PLLC

2 By: /s Richard P. Lentini

3 Richard P. Lentini, WSBA No. 18086

4 Attorneys for Defendant,

SSA MARINE, INC.

5  
6 DATED: February 24, 2009

GRAHAM & DUNN, PC

7 By: /s Clemens H. Barnes

8 Clemens H. Barnes, WSBA No. 4905

9 Attorneys for Defendant,

PACIFIC MARITIME ASSOCIATION

10  
11 DATED: February 24, 2009

CONNOR & SARGENT, PLLC

12 By: /s Stephen P. Connor

13 Stephen P. Connor, WSBA 14305

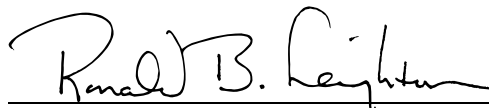
14 Attorneys for Plaintiff,

TINA HART

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16 \* \* \* \* \*

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18 Based on the foregoing stipulation of the Parties, the pleadings, and the papers on file  
19 in this Action, those matters of which the Court may properly take judicial notice, and good  
20 cause appearing therefore, Plaintiff Tina L. Hart shall be permitted to file her proposed First  
21 Amended Complaint. IT IS SO ORDERED.

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23 Dated this 2<sup>nd</sup> day of March, 2009

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27 RONALD B. LEIGHTON

28 UNITED STATES DISTRICT JUDGE